

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DH CAPITAL, LLC,

Plaintiff,

v.

XANADOO, LLC,

Defendant.

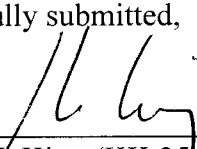
07 CV 5579 (RMB)

**NOTICE OF MOTION FOR
ADMISSION OF JOANNA J.
CLINE *PRO HAC VICE***

PLEASE TAKE NOTICE that upon the accompanying Affidavit of Kenneth J. King, Esquire, executed on August 20, 2008, and the exhibits annexed thereto, Xanadoo, LLC ("Xanadoo") will move this Court, before the Honorable Richard M. Berman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on such date and at such time to be set by the Court, for an Order granting Joanna J. Cline admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Defendant Xanadoo, LLC, pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York.

Dated: August 20, 2008

Respectfully submitted,


Kenneth J. King (KK 3567)
PEPPER HAMILTON LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 808-2700

Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DH CAPITAL, LLC,

Plaintiff,

V.

XANADOO, LLC,

Defendant.

07 CV 5579 (RMB)

**MOTION FOR ADMISSION
OF JOANNA J. CLINE *PRO HAC*
*VICE***

MOTION FOR ADMISSION PRO HAC VICE

PURSUANT TO LOCAL RULE 1.3(c) of the Local Rules of the United States

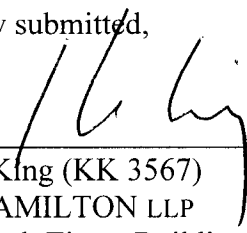
District Courts for the Southern and Eastern Districts of New York, I, Kenneth J. King, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Joanna J. Cline
Pepper Hamilton LLP
3000 Two Logan Square, 18th & Arch Streets
Philadelphia, PA 19103
215-981-4000
clinej@pepperlaw.com

Joanna J. Cline is a member in good standing of the Bars of the Commonwealth of Pennsylvania and the State of New Jersey. There are no pending disciplinary proceedings against Joanna J. Cline in any State or Federal Court.

Dated: August 20, 2008

Respectfully submitted,



Kenneth J. King (KK 3567)
PEPPER HAMILTON LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 808-2700

Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
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**AFFIDAVIT IN SUPPORT OF
MOTION FOR ADMISSION
OF JOANNA J. CLINE
*PRO HAC VICE***

Kenneth J. King, Esquire, being duly sworn, deposes and says:

1. I am a member of the bar of this Court and a partner at Pepper Hamilton LLP, counsel for Xanadoo, LLC (“Xanadoo”) in this action. I submit this affidavit in support of Xanadoo’s application for an order granting Joanna J. Cline *pro hac vice* admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Xanadoo, pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York.

2. Joanna J. Cline is a partner at Pepper Hamilton, LLP. She is admitted to practice before the courts of Pennsylvania and New Jersey. She is and has been a member in good standing of the bars of the Commonwealth of Pennsylvania and the State of New Jersey. Her Certificates of Good Standing are annexed hereto as Exhibit A.

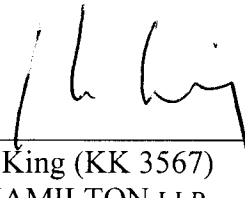
3. Pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York, I request that Joanna J. Cline be permitted to argue or try the above-captioned case.

4. Attached as Exhibit B is a proposed Order granting this motion.

5. There has been no prior application in this case for the *pro hac vice* admission of Joanna J. Cline.

WHEREFORE, it is respectfully requested that this Court grant Joanna J. Cline *pro hac vice* admission to the bar of this Court for the purpose of arguing and trying this case.

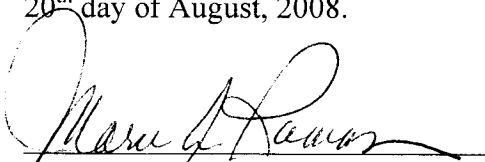
Respectfully submitted,



Kenneth J. King (KK 3567)
PEPPER HAMILTON LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 808-2700

Attorney for Defendant

Sworn to before me this
20th day of August, 2008.


Notary Public

MARIE A. RAMOS
NOTARY PUBLIC, State of New York
No. 01RA5038297
Qualified in Bronx County
Certificate Filed in New York County
Commission Expires Jan. 23, 2011



Supreme Court of Pennsylvania

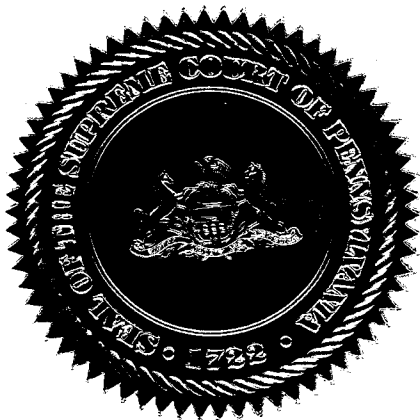
CERTIFICATE OF GOOD STANDING

Joanna J. Cline, Esq.

DATE OF ADMISSION

March 8, 1999

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 31, 2008

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

Supreme Court of New Jersey

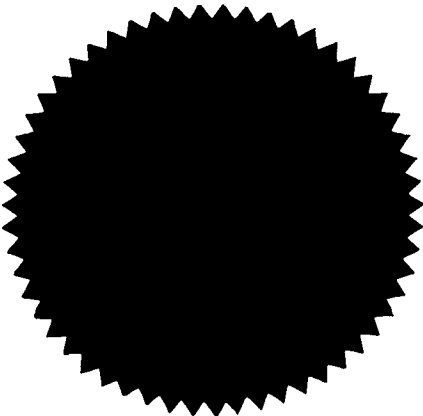


Certificate of Good Standing

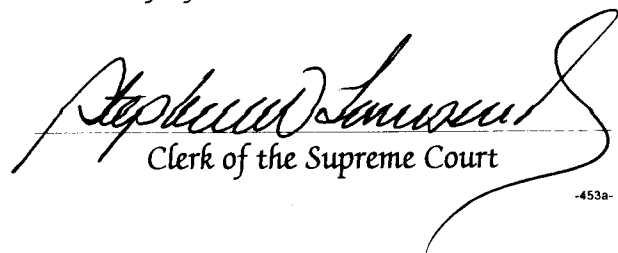
This is to certify that **JOANNA JENNIFER CLINE**
(No. **031131998**) was constituted and appointed an Attorney at Law of New
Jersey on **February 24, 1999** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
4TH day of August , 20 08


Clerk of the Supreme Court

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DH CAPITAL, LLC,

Plaintiff,

V.

XANADOO, LLC,

Defendant.

07 CV 5579 (RMB)

**ORDER GRANTING
ADMISSION OF JOANNA J.
CLINE *PRO HAC VICE***

ORDER

On this 20th day of August, 2008, upon the motion of Xanadoo, LLC for an Order pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York granting *pro hac vice* admission to Joanna J. Cline in connection with the above-captioned case, and upon consideration of the motion and the affidavit in support thereof, it is ORDERED that

Joanna J. Cline
Pepper Hamilton LLP
3000 Two Logan Square, 18th & Arch Streets
Philadelphia, PA 19103
215-981-4000
clinej@pepperlaw.com

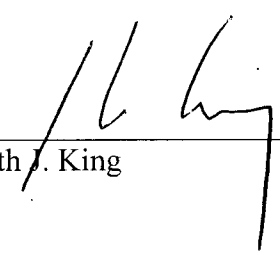
is GRANTED *pro hac vice* admission to the bar of this Court for the purpose of participating in, arguing and trying this action. Counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Richard M. Berman
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of August, 2008, a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* was served upon the persons listed below via First Class U.S. Mail.

Lance J. Gotko, Esquire
FRIEDMAN KAPLAN
SEILER & ADELMAN LLP
1633 Broadway
New York, NY 10019-6708



Kenneth J. King